

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.) Case No. 20-mj-2158-MBB
CHARLES LIEBER,)
Defendant.)

)

MOTION TO MODIFY ORDER SETTING CONDITIONS OF RELEASE

Defendant Charles Lieber respectfully requests that the Court modify its Order Setting Conditions of Release as to Charles Lieber (Dkt. #15) to provide that he may travel domestically, with the permission of the U.S. Probation Office (“USPO”), without also having to obtain a Court order, for the purpose of visiting immediate family members in New Jersey and Pennsylvania. The government and the USPO are aware of the identities of these family members. The government has advised that it assents to this motion. The USPO has also advised that it assents to this motion.

In support of this motion, Defendant states the following. On January 28, 2020, Mr. Lieber had his initial appearance before this Court. On January 30, 2020, Mr. Lieber was released on a \$1,000,000 cash appearance bond. Among other conditions, Mr. Lieber and his wife were ordered to surrender their passports to pretrial services and Mr. Lieber’s travel was restricted to the District of Massachusetts.

Mr. Lieber seeks this slightly less restrictive travel condition to enable the USPO to directly supervise and approve Mr. Lieber’s requests for domestic travel to visit immediate

family members in New Jersey and Pennsylvania. As noted above, the government has advised that it assents to this motion and the USPO has also advised that it assents to this motion.

Defendant Charles Lieber therefore respectfully request that the Court modify its Order Setting Conditions of Release (Dkt. #15) to allow the USPO to directly supervise and approve Mr. Lieber's requests for domestic travel to visit immediate family members in New Jersey and Pennsylvania.

Respectfully submitted,

CHARLES LIEBER

By his attorneys,

/s/ Peter K. Levitt

Peter E. Gelhaar (BBO# 188310)

Peter K. Levitt (BBO# 565761)

DONNELLY, CONROY & GELHAAR, LLP

260 Franklin Street, Suite 1600

Boston, Massachusetts 02110

(617) 720-2880

pkl@dcglaw.com

Dated: March 11, 2020

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on March 11, 2020.

/s/ Peter K. Levitt

Peter K. Levitt